

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
MANHATTAN DIVISION**

VIRTUAL SOLUTIONS LLC,

Plaintiff,

v.

Case No. 12-CV-1118 (SAS)

MICROSOFT CORP.,

Defendant.

**DECLARATION OF TIMOTHY E. GROCHOCINSKI IN SUPPORT OF VIRTUAL
SOLUTIONS LLC'S RESPONSE IN OPPOSITION TO MICROSOFT CORPORATION'S
MOTION FOR SUMMARY JUDGMENT OF INVALIDITY FOR INDEFINITENESS**

I, Timothy E. Grochocinski, declare as follows:

1. I am an attorney licensed to practice in the States of Illinois and Missouri. I am the founder and managing attorney of InnovaLaw, P.C., counsel for Virtual Solutions LLC in this case. I make these statements based on my own personal knowledge.

2. This declaration is made in support of Virtual Solutions LLC's Response in Opposition to Microsoft Corporation's Motion for Summary Judgment of Invalidity for Indefiniteness.

3. Attached hereto as Exhibit 1 is a true and correct copy of the definition of "generator" from Dictionary.com's 21st Century Lexicon, *available at* <http://dictionary.reference.com/browse/generator?s=t>.

4. Attached hereto as Exhibit 2 is a true and correct copy of the definition of "generator" from the Oxford Dictionary, *available at* <http://oxforddictionaries.com/definition/english/generator>.

5. Attached hereto as Exhibit 3 is a true and correct copy of the definition of “generator” from The American Heritage Dictionary, *available at* <http://www.ahdictionary.com/word/search.html?q=generator>.

6. Attached hereto as Exhibit 4 is a true and correct copy of the definition of “virtual environment” from Dictionary.com’s 21st Century Lexicon, *available at* http://dictionary.reference.com/browse/virtual_environment.

7. Attached hereto as Exhibit 5 is a true and correct copy of the definition of “virtual environment” and “virtual reality” from Wikipedia, *available at* http://en.wikipedia.org/wiki/Virtual_environment.

I declare under penalty of perjury that the foregoing is true and accurate.

DATED: November 16, 2012

Respectfully submitted,

/s/ Timothy E. Grochocinski
Timothy E. Grochocinski